

Hearing Date: June 6, 2018 at 9:30 a.m. (Atlantic Standard Time)

Objection Deadline: April 9, 2018 at 4:00 p.m. (Atlantic Standard Time)

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 1063, 1150, 1715

(Jointly Administered)

**SUMMARY OF SECOND INTERIM APPLICATION OF THE LAW OFFICES OF
ANDRES W. LOPEZ, PSC FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE
PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY FOR
THE PERIOD FROM OCTOBER 1, 2017 THROUGH DECEMBER 31, 2017**

Name of Applicant:

The Law Offices of Andrés W. López, P.S.C.
("AWLLAW")

Authorized to Provide Professional Services to:

Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF") as the entity authorized to act on behalf of the Commonwealth of Puerto Rico

Period for which compensation and reimbursement are sought:

October 1, 2017 through December 31, 2017

Amount of Compensation sought as actual, reasonable, and necessary: \$76,055.00

Amount of Expense Reimbursement sought as actual, reasonable, and necessary: \$0.00

This is a(n): monthly interim final application

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- Blended Rate in this application for attorneys: \$350/hr
- Blended Rate in this application for all timekeepers: \$350/hr

Prior Monthly Fee Statements Filed:

Compensation Period	Fees Requested	Expenses Requested
May 9, 2017 – November 30, 2017	\$108,325.00	\$200.00
December 1, 2017 – December 31, 2017	\$27,160.00	\$0.00

- Both payments have been partially made, for 90% of the total amount.

TABLE OF SCHEDULES AND EXHIBITS

Schedule A - List and Summary of Hours by Professional

Schedule B - Summary of Hours and Compensation by Matter Code

Schedule C - Expense Summary

Schedule D - Customary and Comparable Disclosures

Exhibit A - Attorney Certification

Exhibit B - Detailed Time and Expense Records

Schedule A

LIST AND SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name	Title or Position	Hours Billed in this Application	Hourly Rate Billed in this Application	Total Compensation
Andrés W. López	Partner	217.30	\$350.00	\$76,055.00
TOTAL		217.30		\$76,055.00

Schedule B

SUMMARY OF HOURS AND COMPENSATION BY MATTER CODE

Task Code	Matter Description	Total Billed Hours	Total Fees Requested
<i>Commonwealth Title III Case</i>			
Litigation	This category includes analysis, preparation, and prosecution of adversary proceedings or other litigation.	48.70	\$17,045.00
Relief From Stay and Adequate Protection	This category includes all matters relating to creditor requests for relief from the automatic stay or for adequate protection, including assisting the Commonwealth respond, defend, and settle such requests.	135.60	\$47,460.00
Vendor and Other Creditor Issues	This category includes all meetings and communications with vendors and other trade creditors and utility providers.	33.00	\$11,550.00
Total		217.30	\$76,055.00

Schedule C

EXPENSE SUMMARY

Category	Amount
<i>No expenses are requested with this application.</i>	\$0.00
TOTAL	\$0.00

Schedule D

CUSTOMARY AND COMPARABLE DISCLOSURES

Category of Timekeeper	Blended Hourly Rate	
	Billed for FY2017	Billed This Case During the Compensation Period
Partner	N/A	\$350

**UNITED STATES DISTRICT COURT
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In re:

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Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 1063, 1150, 1715

(Jointly Administered)

**SECOND INTERIM APPLICATION OF THE LAW OFFICES OF ANDRES W. LOPEZ,
P.S.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE PUERTO RICO
FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY FOR THE PERIOD
FROM OCTOBER 1, 2017 THROUGH DECEMBER 31, 2017**

The Law Offices of Andrés W. López, P.S.C. (“AWLLAW”), as counsel to the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) as the entity authorized to act on behalf of the Commonwealth of Puerto Rico, the Puerto Rico Sales Tax Financing Corporation, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Electric Power Authority (collectively, the “Debtors”), and certain other public corporations and instrumentalities of the Government of Puerto Rico, pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority, Act 2-2017*, makes its

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second interim application (this “Application”) for allowance of compensation, under sections 316 and 317 of PROMESA, of \$76,055.00 for the period from October 1, 2017 through December 31, 2017 (the “Compensation Period”) in accordance with the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, dated November 8, 2017 [ECF No. 1715] (the “Interim Compensation Order”) and the *Memorandum regarding Fee Review – Timeline and Process*, dated November 10, 2017 (the “Fee Examiner Guidelines”). In support of this Application, AWLLAW respectfully states as follows:

BACKGROUND

1. On May 3, 2017, the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Commonwealth’s representative pursuant to section 315(b) of PROMESA, filed a petition with the Court under title III of PROMESA.

2. On May 5, 2017, the Puerto Rico Sales Tax Financing Corporation (“COFINA”), by and through the Oversight Board, as COFINA’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

3. On May 21, 2017, the Puerto Rico Highways and Transportation Authority (“HTA”), by and through the Oversight Board, as HTA’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

4. On May 21, 2017, the Employees Retirement System for the Commonwealth of Puerto Rico (“ERS”), by and through the Oversight Board, as ERS’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

5. On July 3, 2017, the Puerto Rico Electric Power Authority (“PREPA”), by and through the Oversight Board, as PREPA’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

6. Through Orders of this Court, the Commonwealth, COFINA, HTA, ERS, and PREPA Title III Cases (together, the “Title III Cases”) are jointly administered for procedural purposes only, pursuant to PROMESA section 304(g) and Bankruptcy Rule 1015 [ECF Nos. 242, 537, 1417].

7. This application seeks allowance of compensation and reimbursement of expenses incurred by AWLLAW solely in connection with the COFINA related matters described below.

COMPENSATION REQUESTED

8. AAFAF retained AWLLAW pursuant to an engagement letter dated July 31, 2017 (the “Engagement Letter”). Pursuant to the Engagement Letter, payment of all fees and expenses detailed in this Application will be made exclusively by AAFAF.

9. AWLLAW’s hourly rates are set at a level designed to compensate AWLLAW fairly for the work of its attorneys and are disclosed in detail in the Engagement Letter.

10. AWLLAW’s rates are appropriate for complex corporate, securities, litigation, and restructuring matters, whether in court or otherwise. The rates and rate structure reflect that such complex matters typically involve great complexity, high stakes, and intense time pressures. Further, there have not been any rate increases during the Compensation Period. AWLLAW submits that the compensation requested is reasonable in light of the nature, extent, and value of such services provided to AAFAF.

11. During the Compensation Period, AWLLAW did not receive any payments or promises of payment from any other source for services rendered or to be rendered in any

capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between AWLLAW and any other person for sharing of compensation to be received for services rendered in these cases.

SUMMARY OF SERVICES

12. During the Interim Period, AWLLAW provided important professional services to the Debtors in connection with the Title III Cases. Detailed descriptions of the specific services provided and the time expended performing such services are attached as **Exhibit B**, and a summary of the services AWLLAW provided to the Debtors during the Compensation Period is set forth below.

13. In its fee applications, AWLLAW will use the subject matter categories (each, a “Matter Category”) used by its co-counsel law firm, O’Melveny & Myers LLP (“OMM”), for keeping time records of the work performed for the Debtors. The following is a summary, by Matter Category, of the professional services provided by AWLLAW during the Compensation Period.

a) Litigation – 48.70 hours – \$17,045.00

14. This category includes analysis, preparation, and prosecution of adversary proceedings or other litigation. During the Compensation Period, AWLLAW worked with OMM on various litigation matters and on motions filed pursuant to Rule 2004 seeking to conduct discovery of various issues relating to Puerto Rico’s fiscal matters.

b) Relief from Stay and Adequate Protection – 135.60 hours – \$47,460.00

15. This category includes all matters relating to requests for relief from the automatic stay or for adequate protection, including assisting the Commonwealth to respond, defend, and settle such requests. During the Compensation Period, AWLLAW worked with OMM in

analyzing and responding to requests to lift the Title III stay (either by motion or lift stay notice), and in implementing a lift stay protocol to streamline the process for seeking relief from the Title III stay.

c) Vendors and Other Creditor Issues – 33.0 hours -- \$11,550.00

16. This category includes all meetings and communications with vendors and other trade creditors and utility providers. During the Compensation Period, AWLLAW worked with OMM in helping to analyze issues and payment disputes with various government vendors, and to resolve the issues and disputes as appropriate.

ATTORNEY CERTIFICATION

14. In accordance with Puerto Rico Local Bankruptcy Rule 2016-1(a)(4), the undersigned has reviewed the requirements of Puerto Rico Local Bankruptcy Rule 2016-1(a)(4) and certifies to the best of his information, knowledge, and belief that this Application complies with Puerto Rico Local Bankruptcy Rule 2016-1(a)(4). In this regard, and incorporated herein by reference, the *Certification of Andrés W. López* in accordance with the U.S. Trustee Guidelines is attached hereto as **Exhibit A**.

NO PRIOR APPLICATION

15. No prior application for the relief requested by this Application has been made to this or any other court.

WHEREFORE, AWLLAW respectfully requests that the Court enter an order: (a) awarding AWLLAW compensation for professional services provided during the Compensation Period in the amount of \$76,055.00; and (b) granting such other relief as is appropriate under the circumstances.

Dated: March 20, 2018
San Juan, Puerto Rico

Respectfully submitted,

/s/Andrés W. López
Andrés W. López
USDC No. 215311
**THE LAW OFFICES OF
ANDRÉS W. LÓPEZ, P.S.C.**
902 Fernández Juncos Ave.
San Juan, PR 00907
Tel: (787) 294-9508
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*Attorneys for the Puerto Rico Fiscal Agency
and Financial Advisory Authority*

Exhibit A

ATTORNEY CERTIFICATION

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.²

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 1063, 1150, 1715

(Jointly Administered)

**CERTIFICATION OF ANDRES W. LOPEZ PURSUANT TO PUERTO RICO LOCAL
BANKRUPTCY RULE 2016-1(a)(4)**

Andrés W. López, under penalty of perjury, certifies as follows:

1. I am a partner with the law firm of The Law Offices of Andres W. López, P.S.C. (“AWLLAW”). I make this certification in accordance with Rule 2016-1(a)(4) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Puerto Rico (the “Local Rules”) regarding the contents of applications for compensation and expenses.

2. I am familiar with the work performed by AWLLAW for the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), acting for or on behalf of the Debtors.

² The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. I have read the *Second Interim Application of The Law Offices of Andrés W. López, P.S.C. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses As Counsel to the Debtors for the Period From October 1, 2017 through December 31, 2017* (the “Application”), and the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

4. To the best of my knowledge, information, and belief, formed after reasonable inquiry, the fees and disbursements sought in the Application are permissible under PROMESA, the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Interim Compensation Order, the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013* (the “Guidelines”), and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Puerto Rico.

Dated: March 19, 2018

/s/Andrés W. López
Andrés W. López

Exhibit B

DETAILED TIME AND EXPENSE RECORDS

I. **Litigation**

<u>Date</u>	<u>Services</u>	<u>Hours</u>
10/4/17	Correspond w/M. Pocha re notices of appearance in adversary proceeding and receiving Court Orders and notifications (0.3); conduct factual research re same (0.5).	0.80
10/5/17	Correspond w/R. Holm, P. Friedman re objection to fee application (0.3); review draft re same (0.4).	0.70
10/6/17	Review memo from R. Holm re negotiations to resolve AAFAF's objections to a firm's monthly fee statement.	0.10
10/6/17	Correspond w/B. Neve re draft motion to facilitate flow of FEMA funds; review draft motions re same.	0.50
10/7/17	Review memos from B. Neve, S. Uhland re revised federal funds motion; review draft motion re same.	0.50
10/8/17	Review memo from I. Garau re research re APRUM adversary proceeding and procedural history re same (0.2); conference call w/I. Garau re same (0.3); conduct requested research and prepare memo to I. Garau re same (2.5).	3.00
10/8/17	Review memo from B. Neve re update on motion re flow of federal funds and expected filing date.	0.10
10/9/17	Review memo from M. Hindman re mediation report.	0.10
10/10/17	Research re adversary proceedings in which AAFAF and/or its executive director have been served with process (4.0); correspond w/I. Garau re same (0.3).	4.30
10/11/17	Review memos from I. Garau, P. Friedman, M.	0.40

	Yassin re proposed stipulation in new potential adversary matter; review proposed stipulation re same.	
10/12/17	Review memo from B. Neve re additional changes to draft motion and proposed order re federal funds; review drafts and revisions re same.	0.50
10/17/17	Conference call w/AAFAF team, plaintiffs' counsel re potential adversary complaint and attempt to resolve the matter.	1.00
10/19/17	Correspond w/A. Shapiro re informative motion re appearance at October 25, 2017 hearing; review draft motion re same.	0.40
10/20/17	Correspond w/A. Shapiro re informative motion re appearance at October 25, 2017 hearing.	0.20
10/23/17	Correspond w/J. Daniels re unopposed motion to file a sur-reply and related questions re same (0.4); review draft sur-reply re same (0.3).	0.70
10/23/17	Correspond w/B. Neve and review draft reply re urgent motion re use of federal funds post-Maria.	0.40
10/23/17	Correspond w/J. Daniels, R. Holm re response to COFINA senior bondholders' coalition motion (0.3); telephone conference w/R. Holm, J. Daniels re procedural matters re same (0.3); review draft response re same (0.4).	1.00
10/24/17	Correspond w/M. Pocha re question about local rules and depositions; research local rules re same.	0.50
10/26/17	Correspond w/B. Neve re informative motion re submission of amended proposed order; review draft motion re same.	0.40
10/27/17	Prepare transcript request for October 25, 2017 hearing; correspond w/P. Friedman re same.	0.50
10/27/17	Review memo from M. Hindman re mediation update and next mediation dates.	0.10
10/29/17	Review memo from A. Shapiro re informative motion regarding statement made at October 25, 2017 hearing and background re same; telephone	2.50

	conference w/P. Friedman re same; review drafts of motion re same.	
10/30/17	Correspond w/P. Friedman, R. Holm re objection to monthly fee statement; review draft objection re same.	0.50
10/31/17	Correspond w/B. Neve re opposition to motion from FGIC requesting a 90-day stay of all litigation (0.4); review draft motions re same (0.6).	1.00
10/31/17	Correspond w/J. Zujkowski re draft joinder to FOMB objection (0.2); review draft joinder re same (0.3); review memo from I. Garau re same (0.1); telephone conference w/J. Zujkowski re same (0.2).	0.80
10/31/17	Correspond w/R. Holm re transcript for October 25, 2017 Court hearing.	0.20
11/1/17	Review memo from C. Yamin Rivera (AAFAF's associate counsel) re following up on translation of P.R. House Bill 1124; correspond w/translator re same; memo to C. Yamin re same.	0.50
11/1/17	Review memo from A. Shapiro re <i>pro hac vice</i> application for W. Dellinger (0.1); correspond w/A. Shapiro re same (0.2); review W. Dellinger's <i>pro hac vice</i> application (0.4).	0.70
11/2/17	Review memos from P. Friedman, C. Juan re Eleventh Amendment immunity.	0.20
11/2/17	Review official committee of unsecured creditors' objection to motion for a 90-day stay of all litigation in Title III matters.	0.40
11/6/17	Review first amended adversary complaint in APRUM matter.	0.80
11/6/17	Correspond w/J. Daniels re AAFAF's notice of intervention in Commonwealth-COFINA dispute; review draft notice re same.	0.40
11/6/17	Correspond w/translator re pending certified translation (0.2); review certified translation (0.8); memos to and from certified translator re making certain corrections (0.4); memo to C. Yamin re certified translation (0.1).	1.50

11/7/17	Review memo from Judge Houser re mediations (postponing all mediation sessions for the remainder of 2017 and setting forth a mediation schedule for 1Q 2018).	0.20
11/7/17	Review memo from A. Shapiro re informative motions re attendance at next week's Court hearings; review draft informative motions re same; memos to and from A. Shapiro re same.	0.50
11/8/17	Review Court Order giving notice of proposed new member of mediation team (Judge Colton).	0.10
11/8/17	Review FGIC's omnibus reply to objections to request for a 90-day stay of all litigation.	0.20
11/8/17	Correspond w/A. Shapiro re AAFAF informative motion re attendance at November 15, 2017 hearing; review informative motion re same.	0.40
11/8/17	Correspond w/R. Camara re request for a conference call re FOMB's investigative committee.	0.20
11/13/17	Correspond w/ J. Daniels re draft motion to enforce stipulation and order approving procedure for resolving Commonwealth-COFINA dispute and to dismiss other claims and counterclaims (0.3); review and revise draft motion (0.7); memo to J. Daniels, R. Holm re same (0.2).	1.20
11/13/17	Review memo from R. Camara re conference call to discuss issue re FOMB's investigative committee.	0.10
11/13/17	Review notice of agenda of matters scheduled for the November 15, 2017 omnibus hearing.	0.10
11/14/17	Review case-related documents and pleadings in preparation for omnibus hearing.	2.50
11/15/17	Attend November 15, 2017 omnibus hearing.	4.50
11/16/17	Review notice with written remarks of Judge Houser at November 15, 2017 omnibus hearing.	0.20
11/16/17	Review Court Order denying FGIC's motion for a 90-day stay of all litigation.	0.10
11/17/17	Correspond w/A. Pavel re informative motions to be filed;	0.50

	review draft motions re same.	
11/17/17	Review new adversary complaint (17-AP-278).	0.50
12/1/17	Review Court Order re December 20, 2017 omnibus hearing.	0.10
12/1/17	Review memo from P. Friedman to W. Dellinger re <i>Aurelius</i> case; review memo from W. Dellinger re same; conference w/P. Friedman re case-related matters.	0.50
12/2/17	Memo to W. Dellinger re <i>Aurelius</i> case.	0.10
12/5/17	Correspond w/R. Holm re objection to Ambac's Rule 2004 motion; review and file draft objection re same.	0.50
12/6/17	Correspond w/A. Pavel re draft objection to renewed Rule 2004 motions; review draft motion re same.	0.40
12/7/17	Correspond w/P. Friedman re draft motion to extend time to move to dismiss APRUM's adversary complaint; review draft motion re same.	0.40
12/10/17	Correspond w/B. Neve re motion to inform attendance at December 14, 2017 hearing; review draft motion re same.	0.30
12/11/17	Correspond w/A. Pavel re draft joint statement re Rule 2004 motion; review draft joint statement.	0.40
12/15/17	Correspond w/B. Neve re informative motion re attendance at December 20, 2017 omnibus hearing; review draft motion re same.	0.40
12/19/17	Review case-related documents in preparation for December 20, 2017 omnibus hearing.	3.00
12/19/17	Review memos from I. Blumberg, M. Kremer re draft motion to inform re disclosure of cash balances of Puerto Rico government entities; review draft motion re same.	0.50
12/20/17	Memos to and from M. Kremer re adding Exhibit A to motion filed yesterday re cash balances; telephone conference w/M. Kremer re same.	0.50

12/20/17	Attend December 20, 2017 omnibus hearing.	3.00
12/20/17	Prepare and file transcript order request for today's omnibus hearing; memo to and from A. Shapiro re transcript request for today's omnibus hearing.	0.50
12/20/17	Review memo from Judge Houser re modified mediation plan and timetable.	0.10
12/20/17	Review memo from O. Ramos re National's request for a Rule 2004 motion and meet and confer re same; review memo from P. Friedman re same; memo to and from O. Ramos re same.	0.50
12/27/17	Memos to and from W. Dellinger re scheduling telephone conference to discuss Aurelius matter.	0.20
12/29/17	Memos to and from W. Dellinger, P. Friedman re conference call to discuss Aurelius matter.	0.30
Total Hours:		48.70
Total Fees:		\$17,045.00

II. Relief From Stay and Adequate Protection

10/2/17	Review memos from D. Perez, C. Juan re Court Order in <i>Salud Primaria</i> case, lift stay notices and draft motion to extend certain deadlines re same; review draft re same.	0.50
10/3/17	Review memos from D. Perez, C. Juan, J. Spina re revised stipulation in <i>Cooperativa</i> lift stay notice matter; review draft revised stipulation and related documents re same.	0.50
10/3/17	Review memo from C. Juan re coordinating a conference call to discuss pending matters.	0.10
10/3/17	Review memos from C. Juan, D. Perez and draft stipulation in <i>Aquasur</i> lift stay notice matter, with proposed changes for movant's counsel.	0.40
10/3/17	Review documents re all pending lift stay notices and update status of same.	3.00

10/4/17	Correspond with C. Juan re draft stipulation in <i>PFZ Properties</i> lift stay matter (0.2); review draft and case background re same (0.5).	0.70
10/4/17	Review memo from C. Juan re proposed stipulation in <i>Cano</i> lift stay notice matter; review proposed stipulation re same;	0.40
10/5/17	Correspond w/D. Perez re next steps on <i>Salud Primaria</i> matter.	0.20
10/5/17	Review memos from C. Juan, D. Perez re movants' agreement to a stipulation re lift of stay matter; review draft stipulation re same.	0.40
10/5/17	Review memos from C. Juan, D. Perez re Aquasur's counsel agreement with proposed changes to stipulation re lift stay notice matter; review proposed revisions re same.	0.50
10/6/17	Review memo from C. Juan re Cooperativa's counsel's proposed revisions to stipulation re notice to lift stay (0.1); review proposed revisions re same (0.4); review memo from D. Perez re objections to proposed revisions (0.1); review memos between D. Perez, H. Valdes (counsel to Cooperativa) re same (0.2).	0.80
10/6/17	Review memos from F. Vizcarondo (counsel for Diaz-Cambier, Biales-Verdejo, Vega-Diaz, Cintron-Marzan) and supporting materials re lift stay notices.	0.80
10/6/17	Review memos from C. Juan, D. Perez, J. Spina and updated stipulation in <i>Aquasur</i> for filing.	0.40
10/9/17	Correspond w/D. Perez re recent lift stay notices received this week; next steps re same.	0.20
10/10/17	Correspond w/C. Juan, D. Perez re most recent lift stay notices related to the federal IDEA statute.	0.20
10/10/17	Telephone conference w/C. Juan, W. Burgos re update and next steps on pending lift stay notice matters (0.5); review chart of lift stay notice matters re same (1.0).	1.50

10/10/17	Review memos from C. Juan, J. Spina re <i>Aquasur</i> and <i>Orbi</i> lift stay notice stipulations; review drafts re same.	0.50
10/10/17	Correspond w/D. Perez re Puerto Rico Department of Justice's position on <i>Salud Primaria</i> matter and next steps re same.	0.40
10/10/17	Correspond w/C. Juan, D. Perez re Court Order extending meet and confer deadlines in lift stay notice matters.	0.40
10/10/17	Correspond w/D. Perez re draft stipulation in <i>PFZ Properties</i> lift stay notice matter; changes proposed re same; review revised draft re same.	0.50
10/11/17	Correspond w/C. Juan re <i>PFZ Properties</i> lift stay notice matter and reach out to opposing counsel re draft stipulation re same (0.4); review memo from D. Perez re additional changes to proposed stipulation (0.1); review draft re same (0.3); correspond with D. Carrion (counsel for PFZ Properties) re proposed stipulation (0.2).	1.00
10/11/17	Review memos from D. Perez, C. Juan re proposed stipulation in <i>Cooperativa</i> lift stay notice matter and suggested changes re same; review proposed revisions to draft stipulation.	0.50
10/12/17	Review memo from C. Juan re table of lift stay notices involving IDEA-related matters; review memo from D. Perez re same.	0.30
10/12/17	Review memos from D. Perez, J. Spina, H. Valdes (counsel to Cooperativa) re changes to the stipulation between the parties re lift stay notice.	0.30
10/12/17	Correspond w/D. Perez re recent Court Order requesting that we propose new procedures for approval of stipulations to lift or modify the automatic stay; review Court Order re same.	0.50
10/12/17	Review memos from C. Juan, D. Perez re stipulations reached in various lift stay notice matters (Alicea, Esteva, Ortiz) (0.3); review various drafts of proposed stipulations re same (0.7).	1.00

10/13/17	Review memo and attached chart from C. Juan re most recent list of lift stay notices (0.2); review background documents re same (1.5).	1.70
10/16/17	Correspond w/D. Carrion (counsel for PFZ Properties) re stipulation on lift stay notice; (0.2) review proposed changes to draft stipulation re same (0.3); correspond w/C. Juan, D. Perez re same (0.2).	0.70
10/16/17	Review memo from D. Perez and attached revised draft stipulations re lift stay notice matters (Vega, Alicea, Ortiz, Esteva, Cano).	1.00
10/17/17	Review memos from C. Juan, D. Perez, J. Spina and draft stipulation in <i>Vega-Fernandez</i> lift stay notice matter.	0.50
10/17/17	Review memos from C. Juan, D. Perez re most recent version of <i>Cano</i> lift stay notice stipulation; review stipulation re same.	0.40
10/18/17	Conference call w/AAFAF, Ankura teams re pending vendor matters (0.5); review chart of vendor matters re same (0.2).	0.70
10/19/17	Review memos from C. Juan, D. Perez and draft stipulations in the <i>Esteva</i> and <i>Ortiz-Ortiz</i> lift stay notice matters.	0.70
10/19/17	Review memo from F. Vizcarrondo (counsel to Capellán-Rosa) and supporting documents re lift stay notice; correspond w/C. Juan, D. Perez re same.	0.40
10/19/17	Review memo from L. Murray-Soto re further lift stay notice; correspond w/C. Juan re same.	0.30
10/19/17	Review memo from C. Montilla (counsel for Pentagon Federal Credit Union and BMW Financial Services) and supporting documents re lift stay notice (1.7); correspond w/C. Montilla, D. Penagarícano re same (0.3).	2.00
10/20/17	Review memo from R. Perez-Pietri (counsel to Popular Auto) and attached document re lift stay notice (0.3); correspond w/C. Juan re next steps	1.20

	(0.2); review summary of matter and related documents re same (0.7).	
10/20/17	Correspond w/C. Montilla re scheduling a meet and confer re lift stay notice; correspond w/C. Juan re same.	0.40
10/20/17	Review memos from C. Juan, D. Perez re proposed course of action in certain lift stay matters (0.3); review documents re same (0.8).	1.10
10/23/17	Conference call w/C. Juan, W. Burgos re pending lift stay notice matters (0.5); review chart of pending matters re same (1.0).	1.50
10/23/17	Review memos from C. Juan, D. Perez re <i>Diaz-Colon</i> matter and lift stay notice (0.3); review background documents and case summary re same (1.2).	1.50
10/24/17	Review memos from L. Murray-Soto re follow up on lift stay notice.	0.20
10/24/17	Review memo from J. Rodriguez (counsel to Rentas-Martinez) and attached document re lift stay notice.	0.40
10/24/17	Review memos from J. Spina, C. Juan re Capellan-Rosa lift stay notice and draft stipulation; review draft stipulation re same.	0.40
10/24/17	Review notice to lift stay re Melendez-Perez matter.	0.20
10/25/17	Review memos from C. Juan, D. Perez re lift stay notice (Zambrana-Garcia) and proposed course of action re same; review documents re same.	0.40
10/25/17	Correspond w/J. Spina re GAM Realty motion to lift stay and non-compliance with protocol for filing lift stay notices; review motion to lift stay re same.	0.40
10/26/17	Review memo from C. Juan and attached document summarizing meet and confer in <i>Salud Primaria</i> matter; review background documents re same.	0.50
10/26/17	Review memos from C. Juan, L. Murray-Soto re procedural stage of cases under consideration for	0.40

	lift stay notice purposes.	
10/26/17	Review memo from C. Grovas (counsel to Mitsubishi Motor Sales of Caribbean) re lift stay notice and meet and confer (0.2); review documents related to request (0.8); correspond w/ C. Juan re same (0.2).	1.20
10/26/17	Review memo from M. Mier re lift stay notice (GAM Realty LLC) and accompanying documents re same.	1.50
10/27/17	Correspond w/C. Juan re recommended course of action in GAM Realty lift stay notice matter.	0.20
10/27/17	Review memo from V. Rivera-Rios and attached documents re Caribbean Airport Facilities matter and request for a conference to consider a potential settlement before filing adversary proceeding (0.5); review case-related documents relating to matter (2.0); telephone conference w/V. Rivera-Rios re same (0.3); telephone conference w/V. Rivera Sr. re same (0.4).	3.20
10/30/17	Review memos from C. Juan, J. Spina re lift stay notice matters involving forfeitures and approximate value of pending claims.	0.40
10/30/17	Correspond w/V. Rivera-Rios (counsel to Caribbean Airport Facilities) re scheduling a conference call to discuss case.	0.20
10/30/17	Review memo from F. Vizcarrondo re update on notice to lift stay and meet-and-confer (Rivera-Marcucci); memo to C. Juan re same.	0.20
10/31/17	Review memos from L. Murray-Soto, C. Juan and attached documents re update of proceedings in matters subject to lift stay notice request.	0.40
10/31/17	Review memo from C. Juan and attached draft stipulations in Rivera-Delgado, Cruz-Rodriguez, Fernandez-Jorge lift stay notice matters.	0.50
10/31/17	Correspond w/C. Juan re conversations w/F. Charles (counsel to Ortiz-Rivera) re lift stay notice and next steps in forfeiture matter (0.3);	0.70

	telephone conference w/F. Charles re forfeiture lift stay notice matter and proposed resolution (0.4).	
10/31/17	Review memo from C. Juan re status of <i>Asociación de Salud Primaria</i> matter.	0.10
10/31/17	Review memo from C. Juan re draft stipulation in lift stay notice matter (Caraballo-Caraballo); review draft stipulation re same.	0.30
10/31/17	Review memo from C. Juan and attached updated chart of all lift stay notice matters (1.0); telephone conference w/C. Juan re same (0.4).	1.40
10/31/17	Telephone conference w/V. Rivera (counsel to Caribbean Airport Facilities) re potential resolution of matter.	0.30
10/31/17	Review memo to and from C. Juan, F. Vizcarrondo re follow up on notice to lift stay (Rivera-Marcucci).	0.20
11/1/17	Telephone conference w/Victor Rivera Sr. (counsel to Caribbean Airport Facilities) re potential adversary proceeding.	0.30
11/1/17	Review memo from D. Perez re responding to letter from Caribbean Airport Facilities and proposed stipulation to resolve dispute; review memo response from E. Barak re same.	0.20
11/1/17	Review memo from J. Rodriguez (counsel to Melendez-Perez) re lift stay notice matter, following up on request for meet-and-confer; correspond w/D. Perez re same.	0.40
11/1/17	Review memos from D. Perez, C. Juan, P. Friedman, W. Burgos re next steps in <i>Asociación de Salud Primaria</i> matter, strategy re same.	0.50
11/2/17	Telephone conference w/C. Juan re: motions to lift stay and current status re same.	0.50
11/2/17	Review memos from C. Juan re Melendez Perez lift stay notice.	0.20
11/2/17	Review memo and attachment from L. Murray-Soto (notice to lift stay) arguing that her case is not at a preliminary stage.	0.30

11/2/17	Review memo from H. Bauer re follow-up from counsel on notice of motion to lift stay (Rivera/Saavedra); review background documents re same.	0.50
11/3/17	Review memo from C. Juan following up on pending draft stipulations in lift stay notice cases; review draft stipulations re same.	0.50
11/3/17	Review memo from C. Juan re PR-DOJ's suggested position re notice to lift stay (Melendez-Perez matter); review background documents re same.	0.40
11/3/17	Correspond w/C. Juan, D. Perez re updated chart of lift stay notice matters and procedure for handling them going forward.	0.40
11/6/17	Correspond w/D. Perez re status of F. Charles lift stay notice and recent calls (0.2); memo to D. Perez re same (0.1); conference call w/F. Charles re status of lift of stay notice and next steps (0.2); memo to D. Perez summarizing conversation with F. Charles (0.2); review memo from D. Perez re same (0.1).	0.80
11/6/17	Review memo from D. Perez re position on pending matters included in the updated lift stay notice chart.	0.20
11/6/17	Review memo from F. Rivera-Bujosa re lift of stay notice (Pacheco-Pacheco) (0.1); memo to C. Juan, W. Burgos re same.	0.30
11/6/17	Review memo from C. Juan re position on stipulation re lift stay notice (Rivera-Marcucci); review memo from F. Vizcarondo accepting the terms of the stipulation.	0.30
11/6/17	Review memo from C. Juan to L. Murray-Soto (lift stay notice) re proposed stipulation.	0.10
11/6/17	Review motion filed by Cooperativa de Seguros Múltiples seeking clarification or lift of stay; review memo from C. Juan re same.	0.50
11/7/17	Review memo from E. Rodriguez re notice to lift stay (Roberto Rodriguez matter) and attached documents re same; memo to C. Juan, W. Burgos re same.	0.50
11/7/17	Review memo from M. Mier re following up on lift stay notice for GAM Realty LLC; review background documents re same.	0.40

11/7/17	Review memo from C. Juan re <i>Asociación de Suscripción Conjunta</i> case (a state-court class action that has been settled and as to which judgment has entered) (0.2); review letter from ASC's counsel re same (0.2); review documents related to underlying case (2.5).	2.90
11/8/17	Review memos from C. Juan, I. Garau re proposed stipulation in Caribbean Airport Facilities matter.	0.20
11/8/17	Review memo from C. Juan re agreement re stipulation in Rivera-Marcucci lift stay notice matter; review proposed stipulation re same.	0.30
11/9/17	Telephone conferences w/V. Rivera-Rios, counsel in Caribbean Airport Facilities matter (0.4); telephone conference w/I. Garau re same (0.3); telephone conference w/C. Juan re same (0.3); review case-related documents re same (1.50).	2.50
11/9/17	Correspond w/C. Juan, D. Perez re lift stay notice (Melendez-Perez); review proposed course of action re same.	0.40
11/9/17	Review memos from F. Charles, C. Juan re stipulation reached in Ortiz-Rivera lift stay notice matter; review proposed stipulation re same.	0.50
11/9/17	Review memo and attached letter from Caribbean Airport Facilities' counsel re proposed stipulation in lift stay notice matter and proposed settlement of underlying litigation (0.4); correspond w/C. Juan, D. Perez re same (0.4); review memo from C. Juan to CAF's counsel (V. Rivera-Rios) re same (0.1); review draft stipulation in CAF lift stay notice matter re same (0.3).	1.20
11/10/17	Review memo from C. Juan re draft stipulation in Pentagon Federal Credit Union and BMW Financial Services lift stay notices matter; review draft stipulation re same.	0.40
11/10/17	Review memo from D. Perez re draft stipulations in <i>Rivera-Marcucci</i> and <i>Rentas-Martinez</i> lift stay notice matters (0.2); review draft stipulations re same (0.6).	0.80
11/10/17	Review memo from C. Juan and attached chart re status of lift stay notice matters.	0.80
11/10/17	Telephone conference w/C. Juan re review and discussion	0.50

of pending lift stay notices.

11/10/17	Review memo from F. Vizcarrondo (counsel for plaintiff in Colon-Rosario) re following up on status of evaluation of lift stay notice; memo to C. Juan re same.	0.20
11/10/17	Review memo from F. Vizcarrondo (counsel for plaintiff in Mercado-Nieves matter) re lift stay notice and potential filing of federal complaint; memo to C. Juan re same; review supporting documents re same.	0.50
11/10/17	Review memos to and from C. Juan, F. Vizcarrondo re several pending matters (in federal IDEA cases) and potential for a global settlement re same.	0.20
11/11/17	Memos to D. Perez re draft stipulations in various lift stay notice matters; review memo from D. Perez re same.	0.30
11/11/17	Prepare memo to D. Perez re pending issues in lift stay notice matters.	1.00
11/13/17	Review memo from C. Juan to F. Vizcarrondo re status of case analysis re pending lift stay notice matters; correspond w/C. Juan re same.	0.30
11/13/17	Review memo from D. Perez re lift stay notice (Melendez-Perez).	0.10
11/13/17	Correspond w/D. Perez re lift stay notice matters that are pending a public policy determination.	0.20
11/13/17	Review memos from L. Murray-Soto, C. Juan re proposed stipulation in second lift stay notice matter and attached documents re same.	0.30
11/13/17	Correspond w/D. Perez, C. Juan re follow-up on lift stay notice memo prepared after last conference call.	0.20
11/13/17	Correspond w/I. Garau re letter received at AAFAF re lift stay notice; review letter re same; memos to and from C. Juan re next steps.	0.50
11/13/17	Correspond w/C. Juan re list of cases that have been settled and as to which judgment has been entered, review list of underlying cases and circumstances; memo to D. Perez re same.	0.50

11/13/17	Review memo from I. Garau re bankruptcy-case document received at AAFAF; review document re same; memo to I. Garau, D. Perez re same.	0.30
11/13/17	Review memo from D. Perez re FOMB's comments on draft stipulations (BMW Financial-Pentagon Federal, Caribbean Airport Facilities, and Ortiz-Rivera); review FOMB's comments re same; review draft stipulations re same.	0.50
11/13/17	Review Court Order denying Cooperativa de Seguros Múltiples' motion to lift stay; review memo from D. Perez to AAFAF team re same.	0.30
11/14/17	Review memos from C. Juan to V. Rivera-Rios (counsel for Caribbean Airport Facilities) re draft of stipulation to modify automatic stay.	0.20
11/14/17	Review memo from D. Perez re edits to proposed stipulation in the Ortiz lift stay notice matter; review edits re same.	0.40
11/15/17	Review memo from C. Juan and attached document re draft stipulation in Murray-Soto lift stay notice matters; memo to C. Juan re same.	0.40
11/15/17	Correspond w/C. Juan, D. Perez re draft stipulation in Melendez-Perez lift stay notice matter.	0.40
11/15/17	Review memo from C. Juan and draft stipulation of Popular Auto lift stay notice matter; memo to C. Juan re same.	0.40
11/16/17	Telephone conference w/V. Rivera-Rios (counsel for Caribbean Airport Facilities) re proposed stipulation re lift stay notice matter.	0.30
11/16/17	Correspond w/C. Juan, D. Perez re status of state-court class action and consultation with AAFAF.	0.30
11/16/17	Review memo from F. Vizcarrondo (counsel for Colon-Rosario) re lift stay notice; memo to C. Juan, W. Burgos re same.	0.20
11/16/17	Review memo from J. Rodriguez (counsel in Melendez-Perez and Rentas-Martinez lift stay notice matters) re lift stay notice; memo to C. Juan, W. Burgos re same.	0.20
11/16/17	Telephone conference w/I. Garau re ASC state court class action and next steps (0.4); memo to C. Juan re same (0.2);	1.50

review memo from C. Juan to A. Amadeo-Murga (counsel for plaintiffs) re same (0.1); review background documents re same (0.8).

11/16/17	Correspond w/C. Juan re upcoming conference call re pending lift stay notice matters.	0.20
11/17/17	Correspond w/C. Juan, D. Perez re Popular Auto lift stay notice matter, follow up re proposed draft stipulation.	0.40
11/17/17	Review memo from P.J. Porrata re lift stay notice matter.	0.10
11/17/17	Review lift stay notice from F. Vizcarrondo (Capellan-Rosa); memo to C. Juan re same.	0.20
11/17/17	Telephone conference with C. Juan re pending lift stay motions.	0.50
11/19/17	Review memo from J. Rodriguez (counsel to Melendez-Perez) re stipulation on notice to lift stay.	0.10
11/21/17	Review memos from C. Juan to J. Rodriguez (counsel to Melendez-Perez) re stipulation on notice to lift stay.	0.40
11/22/17	Review memo from C. Juan re draft stipulation in Melendez-Perez and review draft re same.	0.40
11/22/17	Telephone conference w/C. Juan, W. Burgos re chart of pending lift stay notice matters and next steps re same (0.50); review chart and background documents re same (3.50).	4.00
11/24/17	Review notes from conference call on lift stay notices and prepare memo with action items for D. Perez re same.	1.00
11/25/17	Review memo from J. Rodriguez (counsel to Melendez-Perez) re stipulation on notice to lift stay; memo to D. Perez re same.	0.20
11/27/17	Review memo from V. Rivera-Rios (counsel to Caribbean Airport Facilities) re revised draft stipulation and review same.	0.40

11/27/17	Review memo from J. Rodriguez (counsel to Melendez-Perez) re stipulation on notice to lift stay; correspond w/D. Perez, C. Juan re same.	0.40
11/27/17	Correspond with D. Perez, C. Juan re responses to action items on lift stay notices.	0.50
11/27/17	Review memos from D. Perez re draft stipulations on lift stay notices (Melendez-Perez and Colon-Rosario); review draft revised stipulation in Colon-Rosario.	0.50
11/27/17	Memo to C. Juan, W. Burgos re motion for reconsideration filed in Cooperativa de Seguros Múltiples matter (lift stay notice).	0.10
11/28/17	Review memos from C. Juan, D. Perez re draft stipulation in Melendez-Perez lift stay notice matter; review revised draft re same.	0.40
11/28/17	Review motion to lift stay filed by GAM Realty and documents re same (1.5); memo to C. Juan, W. Burgos, D. Perez re same (0.2); review memo from C. Juan summarizing case background (0.3).	2.00
11/28/17	Review memo from C. Juan re Court Order scheduling briefing on Cooperativa's motion for reconsideration; review memo from D. Perez re scheduling a call to discuss same; memo to D. Perez re same; review memo from C. Juan re same.	0.50
11/29/17	Telephone conference w/I. Garau re issues related to recently filed motion to lift stay and pending lift stay notice matters.	0.50
11/29/17	Telephone conference w/N. Vargas (counsel to L. M. Rodriguez) re lift stay notice and request for a meet and confer re same; review memo and materials sent by attorney Vargas re same.	0.40
11/29/17	Correspond w/F. Rivera-Bujosa (counsel to Pacheco-Pacheco) re lift stay notice and request for a meet and confer.	0.20
11/29/17	Telephone conference with D. Perez, I. Garau, C. Juan, W. Burgos re recently filed motions to lift stay	0.50

and for reconsideration of Court Orders.

11/29/17	Review memo from J. Rodriguez (counsel to Melendez-Perez) re changes to the draft stipulation.	0.10
11/29/17	Correspond w/D. Perez re potential filing of motion and availability re same.	0.20
11/30/17	Review memo from C. Juan containing proposed revised stipulation in Caribbean Airport Facilities lift stay notice matter; review proposed revisions re same.	0.40
11/30/17	Memo to D. Perez, C. Juan, W. Burgos re L. Murray-Soto's filing of a proof of claim.	0.10
12/1/17	Review memo from C. Juan re L. Rodriguez lift stay notice matter and recommended course of action; review case background re same.	0.50
12/1/17	Review memos from D. Perez, C. Juan re J. Rodriguez lift stay notice matter (0.4); review draft revised stipulation re same (0.2).	0.60
12/4/17	Review memos from L. Murray-Soto and C. Juan re administrative proceeding at Puerto Rico Treasury Department and lift stay notice regarding pending matters; review documents re same.	0.50
12/4/17	Review memos from D. Perez, C. Juan re GAM Realty motion to lift stay and status of conversations with GAM's counsel; review memo from C. Juan re agreement on a stipulation.	0.50
12/4/17	Review memos from C. Juan, V. Rivera-Rios (counsel to Caribbean Airport Facilities) re approval of the stipulation re lift stay notice matter.	0.30
12/5/17	Telephone conference w/V. Rivera-Rios (counsel for CAF) re other pending lift stay notice matters; correspond w/D. Perez re procedure for continuing litigation in state court after the parties stipulate to lift stay.	0.50
12/5/17	Review memo from C. Juan re research on status of Puerto Rico Treasury Department's administrative proceedings	0.50

filed by L. Murray-Soto; correspond w/D/ Perez re same; correspond w/C. Juan re same; review amended draft of stipulation to incorporate these administrative matters.

12/5/17	Memos to and from D. Perez, C. Juan re L. Rodriguez lift stay notice matter and proposed course of action and stipulation re same.	0.70
12/6/17	Review memo from movant's counsel in J. Rodriguez lift stay notice matter re order received from state court (0.2); memos to and from D. Perez, C. Juan re same (0.4); review memos from C. Juan and movant's counsel re next steps (0.2).	0.80
12/6/17	Review motion to lift stay filed by A. Rivera (counsel to Colon-Gonzalez); memo to C. Juan, W. Burgos, D. Perez re same; review Court Order terminating motion (for failure to comply with lift stay notice process); memo to C. Juan, W. Burgos, D. Perez re same.	0.50
12/6/17	Review memos from C. Juan, D. Perez re conference call to discuss Lopez-Nieves motion to lift stay; review motion re same.	0.50
12/6/17	Review memo from C. Juan containing revised stipulations to several lift stay notice matters (from Landrón & Vera law firm) (0.2); review draft stipulations re same (0.8).	1.00
12/7/17	Review memo from C. Juan and proposed draft stipulation re L. Rodriguez lift stay notice matter.	0.40
12/7/17	Telephone conference w/D. Perez, C. Juan, W. Burgos, I. Garau re motion to lift stay in Lopez-Nieves matter.	0.50
12/7/17	Conference call w/I. Garau re lift stay notices and procedural questions re plan of adjustment.	0.20
12/7/17	Review filing of motion to lift stay; memo to C. Juan, W. Burgos, D. Perez re likely denial for failure to comply with procedure set forth by the Court; review Court Order denying motion to lift stay and requiring compliance with Court-ordered procedures.	0.50
12/7/17	Review memo from C. Juan re First Circuit's order staying the appeal in <i>Cano</i> ; review case background and proposed next steps re similarly-situated matters.	0.50

12/8/17	Review memo from A. Rivera re lift stay notice (re Gonzalez habeas corpus motion); memo to C. Juan re same; review memo from C. Juan to A. Rivera re same.	0.40
12/9/17	Review motion to lift stay filed by Corporación de Servicios Integrales de Salud; memo to C. Juan re same.	0.40
12/11/17	Review Court Order scheduling briefing in motion to lift stay filed by Corporación de Servicios Integrales de Salud; review memo from C. Juan w/procedural background on the case.	0.50
12/12/17	Review memo from C. Juan re pending issues in lift stay notice matters.	0.10
12/12/17	Review memos from D. Perez and C. Juan with changes to various draft stipulations in lift stay notice matters (brought by Landron & Vera); review draft stipulations re same.	0.50
12/12/17	Review memos from C. Juan, D. Perez re status of revisions and conversations with opposing counsel re GAM Realty lift of stay notice.	0.70
12/12/17	Review memo from S. Levine re lift stay notice request re A. Alvarez del Valle; review supporting document in support of request.	0.50
12/13/17	Review memo from C. Juan re analysis of Alvarez del Valle's lift stay notice request (0.3); review memo from H. Bauer re same (0.2); review memo from D. Perez re same (0.1); review further memos from D. Perez, C. Juan, and L. Roman re same (0.4).	1.00
12/13/17	Review memo from D. Perez re revised stipulation in F. Rodriguez lift stay notice matter; review draft stipulation re same.	0.40
12/13/17	Review memo from C. Juan re draft reply in Salud Primaria matter (0.2); review draft reply re same (0.6).	0.80
12/13/17	Review memos from L. Murray-Soto, C. Juan, D. Perez re Murray-Soto's revised lift stay notice and the Court's Order denying her motion to consolidate (0.5); review	1.00

	memo from C. Juan re draft of lift of stay stipulation, with modifications suggested by Murray-Soto (0.3); review Murray-Soto's reply with further modifications re same (0.2).	
12/14/17	Correspond w/C. Juan re scheduling a conference call to discuss pending lift stay notice matters.	0.20
12/14/17	Review memo and attached document from Y. Vega re lift stay notice.	0.20
12/14/17	Review memos from D. Perez, C. Juan re analysis of Corporación de Servicios Integrales' stay motion.	0.20
12/14/17	Review memos from L. Murray-Soto, C. Juan, D. Perez re revisions to stipulation language re lift stay notice and further drafts re same.	1.00
12/15/17	Memos to and from C. Juan re follow up on stipulation re L. Rodriguez lift stay notice matter.	0.20
12/15/17	Review memos from C. Juan re Quiles Auto Sales lift stay notice and attached document re same.	0.50
12/15/17	Review memos from C. Juan, D. Perez re Corporación de Servicios Integrales case and constitutional challenge re Same (0.2); review documents re same (0.8).	1.00
12/18/17	Review memo from D. Perez and attached document re markup on L. Murray-Soto lift stay notice matter; review further draft stipulation language re same.	0.50
12/18/17	Review pending lift stay notice chart and related documents (2.5); telephone conference w/C. Juan re pending lift stay notices and strategy re same (0.5).	3.00
12/18/17	Review memo from Y. Vega-Vega requesting a lift of the automatic stay; memo to C. Juan, W. Burgos re same.	0.50
12/18/17	Review memo from C. Juan re stipulation in Fournier-Padilla lift stay notice matter; review draft stipulation re same.	0.50
12/18/17	Review memos from C. Juan re stipulations in A. Mercado, M. Simo-Rios, M. Cruz-Alvarez, and G. Fernandez lift stay notice matters (0.5); review draft stipulation re same (1.0).	1.50

12/18/17	Review memos from C. Juan, D. Perez re Corporación de Servicios Integrales' case and constitutional challenge re same; review draft letter to plaintiff counsel re same.	0.50
12/18/17	Review memo from C. Juan re proposed course of action in Gonzalez v. Miranda matter (0.1); review case background re same (0.6).	0.70
12/19/17	Memo to D. Perez re Gonzalez lift stay notice and DOJ's proposed course of action re same.	0.30
12/19/17	Memo to D. Perez re pending lift stay notice stipulations and upcoming conference call re same (0.4); telephone conference w/D. Perez re pending lift stay notice matters and next steps re same (0.5).	0.90
12/19/17	Review memo from C. Juan and proposed global stipulation for pending IDEA-related lift stay notice matters (0.1); review proposed stipulation re same (0.4); memo to D. Perez re same (0.2).	0.70
12/19/17	Memos to and from D. Perez, C. Juan re further request for revisions to stipulation in L. Murray-Soto lift stay notice matter; review proposed revised stipulation re same.	0.50
12/19/17	Review memos from D. Perez, P. Possinger, S. Levine re potential stipulation in A. Alvarez lift stay notice matter (0.3); review memo from C. Juan re same (0.1); review memos from S. Levine objecting to proposed stipulation language (0.3); review memo from C. Juan re same (0.1).	0.80
12/19/17	Review memo from attorney J. Olmo re lift stay notice (Flores-Perez matter); review memo from H. Bauer re same; memo to C. Juan re same.	0.50
12/19/17	Review memo from C. Juan re Corporación de Servicios Integrales lift stay notice matter and plaintiff's counsel agreement to stipulation to lift stay; review draft stipulation re same.	0.40
12/19/17	Review memo from C. Juan re draft omnibus lift stay motion in compliance with Court's third case management order (0.1); review draft motion re same (0.4);	0.70

memos to and from D. Perez re same (0.2).

12/20/17	Review memo from D. Perez re Gonzalez lift stay notice matter; memo to C. Juan re same.	0.40
12/20/17	Memo to and from C. Juan re request for assistance on certain pending lift stay notice matters (0.2); review lift stay notice matters outlined in C. Juan's memo (1.5).	1.70
12/20/17	Review memo from C. Juan re [REDACTED] [REDACTED] (0.1); review memos from C. Juan, D. Perez re communications with plaintiff's counsel (0.2); review memo from C. Juan with proposed revised stipulation (0.1); review draft stipulation re same (0.3).	0.70
12/20/17	Review memos from D. Perez re CSI lift stay notice matter and marked-up draft of stipulation (0.2); review revised stipulation (0.3); review memos from D. Perez, C. Juan reflecting further amendments to stipulation (0.2).	0.70
12/20/17	Review memo from D. Perez re upcoming deadline to file omnibus lift stay motion; review revised draft of omnibus motion.	0.40
12/21/17	Memo to D. Perez re outstanding lift stay notices and proposed next steps re same.	0.80
12/21/17	Review memo from C. Juan re Y. Vega lift stay notice matter; review case background re same; memos to and from D. Perez re same.	0.50
12/21/17	Memos to and from C. Juan re pending stipulation and global settlement in several IDEA-related matters; memo to D. Perez re same.	0.50
12/21/17	Review memo from A. Amadeo-Murga and attached supporting documentation re lift stay notice in state court class action (1.5); review memo from C. Juan re case background and position regarding request (0.4)	1.90
12/22/17	Memos to and from D. Perez re pending global settlement in IDEA-related matters.	0.30
12/22/17	Review memo from D. Perez re responses and	0.50

	comments to memo on pending lift stay notice matters; memo to C. Juan re same.	
12/22/17	Review memo from C. Juan re CSI lift stay notice matter and plaintiff counsel's agreement to revised stipulation; review memo from D. Perez re same.	0.40
12/22/17	Review memos from L. Murray-Soto, C. Juan re stipulation to be filed with the Court as part of lift stay notice motion.	0.30
12/22/17	Review memo from C. Juan re Flores-Perez lift stay notice matter and recommended course of action; review case background re same; review memo from D. Perez re same.	0.50
12/22/17	Review memo from C. Juan re potential additional pending stipulations that could be added to omnibus lift stay motion if resolved in time for the filing (0.2); review memo from D. Perez re same (0.1); review proposed draft stipulations of pending lift stay notices (1.2).	1.50
12/22/17	Review memos to and from C. Juan, D. Perez re status of F. Rodriguez lift stay notice matter.	0.20
12/22/17	Review memo from attorney J. Rios-Rios re lift stay notice (L. Roman); review supporting documentation re same; memos to and from C. Juan re same.	0.50
12/22/17	Review memos from attorney J. Rios-Rios re additional lift stay notices (D. Rodriguez, M. Ramery, Y. Rosado) (0.4); review supporting documents re same (0.6).	1.00
12/23/17	Review memo from H. Bauer re contact made by attorney Y. Mafuz-Blanco; review memos from D. Perez, H. Bauer re same.	0.40
12/26/17	Memo to C. Juan, W. Burgos re lift stay notices in D. Rodriguez, M. Ramery, Y. Rosado matters.	0.20
12/26/17	Review memo from attorney J. Lopez-Negron re lift stay notice in IDEA federal case; review memo in support re same; memo to C. Juan, W. Burgos re same.	0.50

12/26/17	Review memo from D. Perez re pending global settlement stipulation in pending IDEA-related matters; review draft stipulation re same.	0.40
12/26/17	Review memo from H. Bauer re motion to lift stay filed by K. Perez; review Court Order denying motion as improvidently filed; review memo from D. Perez re same.	0.40
12/26/17	Review memo from C. Juan re following up on pending lift stay notice matters and request for assistance with lift stay notice matters pending sign-off from co-counsel.	0.20
12/27/17	Review memo from C. Juan re recent Puerto Rico Supreme Court ruling on applicability of automatic stay in forfeiture cases (0.1); review PR Supreme Court decision re same (0.7).	0.80
12/27/17	Review memos from C. Juan, D. Perez re signed stipulation in F. Rodriguez lift stay notice matter.	0.20
12/27/17	Review memo from C. Juan and background materials re [REDACTED] [REDACTED] [REDACTED].	1.50
12/28/17	Review memo from I. Garau re lift stay notice matter (Santana-Baez) received at AAFAF; review lift stay notice re same; memo to C. Juan re same.	0.50
12/28/17	Review memo from D. Perez re revised draft stipulation in L. Rodriguez lift stay notice matter; review revised draft stipulation re same.	0.40
12/29/17	Memos to and from attorney A. Amadeo-Murga and C. Juan re lift stay notice request.	0.30
12/29/17	Review memo from attorney M. Serrano-Urdaz re lift stay notice in various matters; memo to C. Juan re same.	0.40

Total Hours:	135.60
Total Fees:	\$47,460.00

III. Vendor and Other Creditor Issues

10/11/17	Telephone conference w/AAFAF, Ankura teams re pending vendor matters (0.5); review chart of vendor matters re same (0.2).	0.70
10/13/17	Review memo from M. Nazario (counsel to Trinity) re issues with payment from the Puerto Rico government.	0.10
10/16/17	Correspond w/J. Klein from Ankura re vendor payment issues.	0.20
10/23/17	Telephone conference w/M. Velez-Pastrana re various matters concerning pre-petition and post-petition non-payments and outstanding items for various of her clients.	0.50
10/25/17	Conference call w/AAFAF, Ankura teams re pending vendor matters (0.5); review chart of vendor matters re same (0.2).	0.70
10/25/17	Review memo from G. Barrios re Cesar Castillo vendor dispute.	0.10
10/30/17	Correspond w/J. Klein re Stericycle's counsel's communication regarding payment issues; telephone conference w/M. Nazario (Stericycle's counsel) re same.	0.50
10/30/17	Correspond w/M. Velez-Pastrana (counsel to GYC LLC and Commercial Centers Management Realty) re vendor issues regarding government non-payment.	0.40
10/30/17	Telephone conference w/M. Nazario (counsel to Trinity) re vendor payment status.	0.40
10/31/17	Correspond w/O. Fernandez re conference call re vendor payments (Liberty Cable); telephone conference w/O. Fernandez re same.	0.50

11/1/17	Review memos from M. Velez-Pastrana re various clients with pre-petition and post-petition payment issues (0.4); memos to J. Klein, D. Perez re same (0.2).	0.60
11/1/17	Review memo from J. Klein re updated call log of government vendor pre-petition and post-petition payment issues and related matters; review updated call log re same; correspond w/J. Klein re call this week.	0.50
11/2/17	Telephone conference w/J. Klein, D. Perez re outstanding items and follow up re payment to vendors (0.5); review updated chart re same (0.2).	0.70
11/2/17	Memo to M. Velez-Pastrana following up on her memo re solar energy credits and statutory source of the credits.	0.20
11/2/17	Review memo from M. Nazario and attached non-payment schedule re Trinity Services' outstanding invoices for post-petition services rendered to the Puerto Rico Corrections Department.	0.30
11/3/17	Correspond w/M. Velez-Pastrana re green energy fund (vendor non-payment issue).	0.20
11/3/17	Memo to M. Nazario (counsel for Trinity Services) re outstanding vendor payments for post-petition services rendered to the Puerto Rico Corrections Department.	0.20
11/6/17	Memo to J. Klein, D. Perez re following up on memo from M. Velez-Pastrana re outstanding post-petition payments to one of her commercial clients.	0.20
11/7/17	Review memo from M. Velez-Pastrana re copy of draft contract in the Family Department overdue rent lease matter (vendor pre-petition and post-petition payment) (0.1); review draft contract re same (0.8); memo to J. Klein, D. Perez re same (0.2); review memo from M. Velez-Pastrana re outstanding payment (vendor) re UPR's Medical Sciences Campus and vendor Reparto Metropolitano Shopping Center (0.2); memos to M. Velez-Pastrana, D. Perez, J. Klein re same (0.3); correspond w/M. Velez-Pastrana re Reparto Metropolitano (Family Department, lease, payment of post-petition rent) re post-petition invoices (0.3); review post-petition invoices (0.5); memo to J. Klein, D. Perez re same (0.2).	2.60

11/7/17	Correspond w/J. Klein (Ankura Consulting) re vendor dispute re post-petition payments and lease contract reflecting terms and conditions re same (0.2); review contract re same (0.7).	0.90
11/8/17	Correspond w/M. Velez-Pastrana re terms and conditions of lease contract of premises used by PR's Family Department (0.2); review lease contract re same (0.5).	0.70
11/8/17	Review memo from Y. Menendez (Telefonica USA's and Telefonica Larga Distancia's attorney) re government vendor issue (cessation of voice service to PR clients).	0.20
11/9/17	Telephone conferences w/Y. Menendez (Telefonica USA's and Telefonica Larga Distancia's attorney) re government vendor issue (cessation of voice service to PR clients) (0.8); telephone conference w/D. Perez re same (0.2).	1.00
11/9/17	Correspond w/M. Velez-Pastrana re Puerto Rico Family Department's lease contract (vendor issue re post-petition nonpayment) (0.3); correspond w/J. Klein re same (0.2); review lease contract re same (0.5).	1.00
11/10/17	Review memo from M. Velez-Pastrana containing a copy of the Family Department contract without duplicate pages (0.1); review contract re same (0.7); memo to J. Klein, D. Perez re same (0.2).	1.00
11/13/17	Correspond w/J. Klein (Ankura Consulting) re weekly call log with outstanding vendor issues and conference call re same.	0.20
11/14/17	Review memo from J. Klein re weekly call log conference call.	0.10
11/16/17	Review memo from Y. Menendez (counsel to Telefonica) re current clients from Puerto Rico government, discontinuation of service; memo to D. Perez, J. Klein, I. Garau re same.	0.30
11/16/17	Correspond w/J. Klein re conference call to discuss vendor issues and solutions.	0.20
11/17/17	Telephone conference w/J. Klein, D. Perez, I. Garau re vendor issues and solutions (0.50); review vendor issues log re same (0.2).	0.70
11/29/17	Review memo from J. Klein re vendor issues log and conference call today re same; review	0.40

	vendor log; review memo from I. Garau re same.	
11/30/17	Telephone conference with V. Sepulveda (counsel to Puerto Rico's Department of Health) re Cesar Castillo dispute.	0.40
12/6/17	Telephone conference w/AAFAF and Ankura teams re government vendor issues; review weekly vendor chart w/updates re same.	0.50
12/6/17	Correspond w/I. Garau re follow-up from call re vendor issues and Family Department matter.	0.20
12/7/17	Telephone conference w/I. Garau re vendor issue re Department of the Family contract.	0.20
12/8/17	Telephone conference w/M. Vélez-Pastrana re vendor non-payment issues re: Department of the Family, Puerto Rico Green Fund.	0.40
12/8/17	Review memo from V. Sepulveda (Puerto Rico Health Department) re upcoming meeting with vendor Cesar Castillo.	0.10
12/12/17	Review memo from M. Velez-Pastrana re draft lease contract with Puerto Rico Family Department; review draft contract re same.	0.50
12/15/17	Conference w/Department of Health legal counsel, representatives from Cesar Castillo re pending legal dispute and lift stay notice process (3.0); review case-related documents in preparation for meeting with Cesar Castillo's representatives (2.0); telephone conferences w/I. Garau re same (0.5).	5.50
12/20/17	Memos to and from J. Klein re scheduling vendor issues conference call.	0.20
12/20/17	Review memo from M. Nazario (counsel for Trinity) re new issues with vendor payment; review attached document reflecting pending payments.	0.50
12/21/17	Memo to M. Nazario responding to his inquiry regarding overdue vendor payments; memo to J. Klein, D. Perez re same.	0.40

12/22/17	Memos to and from J. Klein re conference call to discuss pending vendor issues (0.2); review pending vendor matters and analyze next steps re same (3.0).	3.20
12/26/17	Review memos from P. Friedman, M. Yassin re [REDACTED] (0.3); memos to and from P. Friedman re same (0.2); review draft motion re same (0.3); revise motion (0.3); memo to P. Friedman re same (0.1); review memo from P. Friedman with changes to draft (0.2); memo to P. Friedman, M. Yassin re final draft of motion and filing re same (0.4); memos to and from P. Friedman re [REDACTED] (0.3); review and revise draft motions re same (0.4); memo to I. Blumberg re same (0.1); review memo from P. Friedman re [REDACTED] (0.1); review memos to and from P. Friedman and [REDACTED] (0.3).	3.00
12/26/17	Memos to and from J. Klein re conference call to discuss vendor matters.	0.20
12/26/17	Review memos from D. Perez, H. Bauer re vendor request for clarification re government leases.	0.50
12/27/17	Telephone conference w/J. Klein, D. Perez re vendor payment issues (0.5); review vendor call log re same (0.2).	0.70
12/27/17	Review memo from J. Klein re contact person in Puerto Rico Department of Corrections regarding Trinity vendor payment issue.	0.20

Total Hours: **33.00**

Total Fees: **\$11,550.00**

For Professional Services rendered:

	<u>Hours</u>	<u>Amount</u>
Andrés W. López, Esq.	217.30	\$76,055.00